

TAB A

THE STATE OF TEXAS

Tarrant

COUNTY

KATHLEEN SHANNON
AFFIDAVIT

Before me, Elizabeth Horton, a Notary Public in and for said County in said State, personally appeared Elizabeth Horton whose name is signed to this Affidavit and who is known to me, and who being by me first duly sworn deposes and says as follows:

1. That my name is Elizabeth Horton, and I reside in Montgomery County, Alabama, and I am over the age of 19 years.

2. I was employed for approximately two months through Kelly Services as a temporary employee assigned to work at a place of business operated by National Seating and Mobility, Inc., and because of that fact I was seeking permanent employment with other businesses that offered better opportunities.

3. Before and during my assignment to work at National Seating and Mobility, Inc., I understood that my employment was purely temporary; therefore I had no expectation that the employment would be made permanent.

4. The office of National Seating and Mobility, Inc., where I worked was managed by Mrs. Emily Williams and her husband, Don William was employed as a technician there.

5. During my short tenure with National Seating and Mobility, Inc., it became readily apparent that Don Williams had great influence at the office.

6. During the course of my employment with National Seating and Mobility, Inc., I came to know Felicia Barrow who was I learned employed with the Alabama Medicaid Agency.

7. I did not then nor do I now consider Ms. Barrow a friend.

8. During the course of my employment with National Seating and Mobility, Inc., NSM was interested only in profits not how its employees arrived at the profits.

9. I was not informed that my job performance at NSM was unsatisfactory to the extent that it could cause a problem with an agency that regulated NSM.

10. Retired special agent Michael Roeder apologized to me after I was acquitted on the charge of filing a false report with a law enforcement agency. He further informed me that defendant Shockley was upset with me because I did not meet with him for an interview.

11. I believed that the information I provided to the Alabama Medicaid Agency was true.

Further, Affiant saith not

Elizabeth Horton
Elizabeth Horton, Affiant

Sworn and subscribed to before me on this the 11th day of March, 2008.

Kathleen Shannon
Notary Public

